

SEALED

**THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

FILED

2011 OCT -5 PM 12:51

CLERK, U. S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY REPUTED CLERK

S A 1 1 G R 0 8 3 2 **X R**

UNITED STATES OF AMERICA.

Plaintiff,

Y.

JESUS MANUEL PEREZ, SR. aka
"CHUY"(1),
JESUS PEREZ, JR. aka "CHUITO" (2),
RAYMUNDO ESTEVAN RIVERA aka
"RAY" (3),
ADOLFO EFREN TAVIRA-
ALVARADO (4),
ANTONIO FIDALGO-CABELLO aka
"TONY" (5), and
JESSICA CAROLINA MARTINEZ (6)

Defendants.

**Vio: CT 1: 18:371 and 18:554 -
Conspiracy to Smuggle Goods from the
U.S.**

**Vio: CT 2: 18: 2, and 18:554
Aiding and Abetting Smuggling Goods
from the U.S.**

Vio: CT 2: 18: 2, and 18:554

Aiding and Abetting Smuggling Goods from the U.S.

THE GRAND JURY CHARGES.

COUNT ONE

(18 U.S.C. § 371, 18 U.S.C. § 554)

That beginning on or about June 16, 2011, and continuing to and including on about July 7, 2011, in the Western District of Texas and elsewhere, Defendants,

JESUS MANUEL PEREZ, SR. aka "CHUY" (1),
JESUS PEREZ, JR. aka "CHUITO" (2),
RAYMUNDO ESTEVAN RIVERA aka "RAY" (3),
ADOLFO EFREN TAVIRA-ALVARADO (4),
ANTONIO FIDALGO-CABELLO aka "TONY" (5), and
JESSICA CAROLINA MARTINEZ (6)

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other, and with others to the Grand Jury known and unknown, to commit offenses against the United States, in violation of Title 18, United States Code, Section 371, that is, the

Defendants and others conspired, combined, confederated and agreed among themselves and with each other and with others known and unknown to knowingly and unlawfully conceal and facilitate the transportation and concealment of any merchandise, an article, and object, prior to exportation, knowing the same to be intended for exportation from the United States contrary to any law and regulation of the United States, to-wit; sixty-seven firearms and assorted ammunition, all in violation of Title 18, United States Code, Section 554.

OVERT ACTS

In furtherance of the conspiracy alleged in Count One, and to effect the objects thereof, at least one of the co-conspirators herein committed one or more of the following overt acts, among others, in the Western District of Texas, and elsewhere:

1. On or about July 5, 2011, **JESUS MANUEL PEREZ, SR. aka "CHUY"(1)**, received a call from an individual known only as PARAJA and arrangements were made between the two for individuals to travel from Eagle Pass, Texas to Houston, Texas, for the purpose of picking up weapons for transportation to Piedras Negras, Mexico.
2. On or about July 5, 2011, **JESUS MANUEL PEREZ, SR. aka "CHUY"(1)**, **JESUS PEREZ, JR. aka "CHUITO" (2)** and **RAYMUNDO ESTEVAN RIVERA aka "RAY" (3)** made arrangements to repair a black 1993 Ford Pick-up truck to be used to travel to Houston, Texas, to collect the weapons and then return them to Eagle Pass, Texas, and then to Piedras Negras, Mexico.
3. On or about July 5, 2011, **JESUS MANUEL PEREZ, SR. aka "CHUY"(1)** and **RAYMUNDO ESTEVAN RIVERA aka "RAY"** purchase and licensed a small flatbed trailer to be used to transport the weapons from Houston, Texas, to Eagle Pass, Texas, an then to Piedras Negras, Mexico.
4. On or about July 6, 2011, **JESUS PEREZ, JR. aka "CHUITO" (2)**, **RAYMUNDO ESTEVAN RIVERA aka "RAY" (3)**, **ADOLFO EFREN TAVIRA-ALVARADO (4)**, **ANTONIO FIDALGO-CABELLO aka "TONY" (5)**, and **JESSICA CAROLINA MARTINEZ (6)** traveled from Eagle Pass, Texas, to Houston, Texas, in the black 1993 Ford Pick-up with the flat bed trailer for the purpose of obtaining the weapons that were to be transported back to Eagle Pass, Texas, and then to Piedras Negras, Mexico.

5. On or about July 7, 2011, JESUS PEREZ, JR. aka "CHUITO" (2), RAYMUNDO ESTEVAN RIVERA aka "RAY" (3), ADOLFO EFREN TAVIRA-ALVARADO (4), ANTONIO FIDALGO-CABELLO aka "TONY" (5), and JESSICA CAROLINA MARTINEZ (6) purchased sheet rock and plywood in Houston, Texas, for the purpose of concealing the weapons while they were being transported from Houston, Texas, to Eagle Pass, Texas, and then on to Piedras Negras, Mexico.

6. On or about July 7, 2011, JESUS PEREZ, JR. aka "CHUITO" (2), RAYMUNDO ESTEVAN RIVERA aka "RAY" (3), ADOLFO EFREN TAVIRA-ALVARADO (4), ANTONIO FIDALGO-CABELLO aka "TONY" (5), and JESSICA CAROLINA MARTINEZ (6) met with unknown individuals in Houston, Texas, and exchanged vehicles for the purpose of obtaining weapons that would then be transported from Houston, Texas, to Eagle Pass, Texas, and then to Piedras Negras, Mexico.

7. On or about July 7, 2011, JESUS PEREZ, JR. aka "CHUITO" (2), RAYMUNDO ESTEVAN RIVERA aka "RAY" (3), ADOLFO EFREN TAVIRA-ALVARADO (4), ANTONIO FIDALGO-CABELLO aka "TONY" (5), and JESSICA CAROLINA MARTINEZ (6) received the following weapons in Houston, Texas, concealed inside the sheet rock and plywood that they had previously purchased:

	Make	Model	Caliber	Serial #
1.	DPMS	A-15	.223	Destroyed
2.	SAIGA	AK Variant	7.62/39	H06103188
3.	CMMG	4SA (AR-15)	.223	D
4.	CENTURY ARMS	R1A1 (FAL V)	308	CA33430
5.	ROCK RIVER	AR-15	5.56	D
6.	ROCK RIVER	AR-15	5.56	2002688
7.	WASR	1063 (AKV)	7.62/39	1984PF6732
8.	SAR	SAR1 (AKV)	7.62/39	S1-821168-03
9.	OLYMPIC ARMS	PCR98	.223/5.56	D
10.	STAG ARMS	15	5.56	70335
11.	WASR	1063 (AKV)	7.62/39	1975FO1842
12.	DRACO	DRACO-C	7.62/39	1969BN3051
13.	RUGER	MINI-14	7.62/39	581-49614
14.	CETME	93 (HKV)	308	C44003
15.	STAG ARMS	STAG 15	5.56	D
16.	WASR	1063 (AKV)	7.62/39	IM3435-78
17.	ROCK RIVER	LAR-15	5.56	KT1066141
18.	DPMS	A-15	5.56	D
19.	COLT	AR-15	.223	D
20.	AK 47		7.62/39	005838
21.	WASR	1063 (AKV)	7.62/39	1974FH2296
22.	DRACO	DRACO-C	7.62/39	DR7874-09
23.	ROCK RIVER	LAR-15	5.56	93273

24.	ARSENAL	SLR95 (AKV)	7.62/39 0931
25.	SIG	5.56	5.56 JS023849
26.	WASR	1063 (AKV)	7.62/39 1968AR1918
27.	STAG ARMS	AR-15	5.56 D
28.	DRACO	DRACO-C	7.62/39 1969BN4691
29.	WASR	1063 (AKV)	7.62/39 1964DE0528
30.	WASR	1063 (AKV)	7.62/39 D
31.	SPIKES TACTICAL	ST-15	MULTI D
32.	BUSHMASTER	XM15	5.56 L291021
33.	LRB ARMS	M15SA	5.56 D
34.	WASR	1063 (AKV)	7.62/39 1972D14522
35.	ZASTAVA	AKV	7.62/39 423781
36.	ROCK RIVER	LAR-15	5.56 D
37.	RUGER	MINI-14	.223 19588742
38.	G	AKV	7.62/39 GP-C500554
39.	STAG ARMS	AR-15	5.56 D
40.	WASR	1063 (AKV)	7.62/39 AS4754-83
41.	SUPERIOR ARMS	S-15	5.56 D
42.	MARS	SAR041	7.62/39 9991100
43.	SUPERIOR ARMS	S-15	5.56 D
44.	ROCK RIVER	AR-15	5.56 D
45.	SKS	SKS	7.62/39 23005881
46.	US CARBINE	30M1	.30 CAR MB0948
47.	SIG ARMS	556R	7.62/39 28A002664
48.	WASR	1063 (AKV)	7.62/39 1976FZ0817
49.	S & W	M & P	5.56 D
50.	BUSHMASTER	XM15	5.56 D
51.	NORENCO	SKSPARA	7.62/39 9302587
52.	CETME	M93 (HKV)	308 C42501
53.	ROCK RIVER	LAR-15	5.56 D
54.	ROCK RIVER	LAR-15	5.56 D
55.	ROMARM	PSL-54C	7.62/54 H8806-79
56.	SPIKES TAC	ST-15	MULTI D
57.	CMMG	MK5	5.56 D
58.	UNIVERSAL	ENFORCER	.30 CAR 160711
59.	SOG ARMORY	SOG-15	MULTI D
60.	SIGA	CANLA12	12 GUAGE H08449079
61.	DRACO	DRACO-C	7.62/39 1968B11138
62.	WASR	1063 (AKV)	7.62/39 1963AB0091
63.	CETME	M93 (HKV)	308 C43911
64.	INLAND	M1 CAR	.30 4986830
65.	DPMS	A-15	.223 D
66.	ROCK RIVER	LAR-15	5.56 D
67.	SKS	SKS	7.62/39 3054

8. On or about July 7, 2011, JESUS PEREZ, JR. aka "CHUITO" (2), RAYMUNDO ESTEVAN RIVERA aka "RAY" (3), ADOLFO EFREN

TAVIRA-ALVARADO (4), ANTONIO FIDALGO-CABELLO aka "TONY" (5), and JESSICA CAROLINA MARTINEZ (6) traveled in the black 1993 Ford pick-up towing the flatbed trailer on IH-10 towards San Antonio, Texas, from Houston, Texas, for the purpose of transporting the above named weapons concealed inside the sheet rock from Houston, Texas, to Eagle Pass, Texas, and then on to Piedras Negras, Mexico.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
(18 U.S.C. §§ 2, 554)

That on about July 7, 2011, in the Western District of Texas and elsewhere, Defendants,

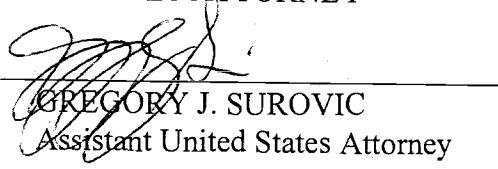
**JESUS MANUEL PEREZ, SR. aka "CHUY" (1),
JESUS PEREZ, JR. aka "CHUITO" (2),
RAYMUNDO ESTEVAN RIVERA aka "RAY" (3),
ADOLFO EFREN TAVIRA-ALVARADO (4),
ANTONIO FIDALGO-CABELLO aka "TONY" (5), and
JESSICA CAROLINA MARTINEZ (6)**

knowingly aided and abetted the unlawful receiving, selling, concealment and facilitation of the transportation and concealment of any merchandise, an article, and object, prior to sending or exportation from the United States, knowing the same merchandise, an article, and object to be sent or exported from the United States contrary to any law and regulation of the United States, to-wit; sixty-seven firearms and assorted ammunition, all in violation of Title 18, United States Code, Section 554, and Title 18, United States Code, Section 2.

A TRUE BILL


Foreperson

ROBERT PITMAN
UNITED STATES ATTORNEY

By: 

GREGORY J. SUROVIC
Assistant United States Attorney